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you fully participate in court proceedings, please contact the court immediately to make arrangements.

MC 01 (3/08) SUMMONS AND COMPLAINT MCR 2.102(B)(11), MCR 2.104, MCR 2.105, MCR 2.107, MCR 2.113(C)(2)(a), (b), MCR 3.206(A)

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| Case No | 50 | | |

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE/AFFIDAVIT OF SERVICE/NONSERVICE ☐ OFFICER CERTIFICATE AFFIDAVIT OF PROCESS SERVER Being first duly swom, I state that I am a legally competent I certify that I am a sheriff, deputy sheriff, bailiff, appointed adult who is not a party or an officer of a corporate party, and court officer, or attorney for a party (MCR 2.104[A[2]), and that (notarization required) that (notarization not required) I served personally a copy of the summons and complaint, . I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, togetherwith List all documents served with the Summons and Complaint on the defendant(s): Defendant's name Complete address(es) of service Day, date, time I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service. Defendant's name Complete address(es) of service Day, date, time I declare that the statements above are true to the best of my information, knowledge, and belief. Signature Service fee Total fee Miles traveled Mileage fee \$ \$ Name (type or print) Subscribed and sworn to before me on County, Michigan. My commission expires: Signature: Deputy court clerk/Notary public Notary public, State of Michigan, County of **ACKNOWLEDGMENT OF SERVICE** I acknowledge that I have received service of the summons and complaint, together with Attachments Day, date, time

on behalf of

Signature

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | CASE NO. | | |
|---|----------------------|---|--------|--|
| Court address 52-3 DISTRICT COURT 700 BARCLAY CIRCLE | E-ROCHESTER-MI:48307 | Court telephone no. (248) 853-5553 | | |
| Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362 | Y | Defendant name(s) and address(es) CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services 601 Abbott Road East Lansing, MI 48823 Equifax Information Services, LICE PO Box 105069 Atlanta, GA 30348 | s, UC. | |
| in Notice and | COMPLAINT | FOR F | • | |

NOW COME the above named Plaintiffs, Paul Tatseos and Eija Tatseos, pro se, and for its Complaint states as follows:

This is a civil action whereby Plaintiff seeks Preliminary and Permanent Injunctive Relief enjoining Defendant, Equifax Information Services, LLC, from engaging in further violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.

An actual controversy exists between the parties, in that the challenged actions of the Defendant has caused and will continue to cause the Plaintiffs substantial harm unless the requested relief is granted.

INTRODUCTION

- 1. Plaintiffs submitted written disputes of several items contained in Plaintiffs' files held and maintained by Defendant, pursuant to 15 U.S.C. § 1681 (i)(a)(1)(A).
- 2. Defendant did not "conduct a reasonable reinvestigation" into Plaintiffs' disputes, pursuant to 15 U.S.C. § 1681 (i)(a)(1)(A), rather relied on their "eOscar" computer system to report inaccurate information.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | CASE NO. |
|--|-------------------|---|---|
| Gourt address 52-3 DISTRICT COURT 700 BARCLAY CIRCLE RO | OCHESTER MI-48307 | F | Court telephone no: (248) 853-5553 |
| Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362 | · · | Defendant name(s) CSC-Lawyers incorp Registered Agent for 601 Abbott Road East Lansing, MI 40 | and address(es) porating Service or Equifax Information Services, LLC |
| et 85 | | Equifax Information PO Box 105069 Atlanta, GA 30348 | £ |

- 3. Plaintiffs submitted several "Method of Verification" requests, pursuant to 15.0:5.C. § 1681 (i)(a)(7) and "Intent to Sue" letters to Defendant upon receipt of reinvestigation results.
- 4. Defendant demonstrated willful noncompliance by not responding to any of Plaintiffs'

 "Method of Merification" requests, and by not providing the information pursuant to 15

 U.S.C. § 1681 (i)(a)(6)(B)(iii).
- 5. Copies of Plaintiffs' letters referenced in paragraphs 1 and 3 can be found in Exhibit 1. US

 Postal Service Certified Mail Return Receipt indicating proof of receipt by Defendant of

 Plaintiffs' letters referenced in paragraphs 1 and 3 can be found in Exhibit 2. In both

 Exhibits, relevant paragraphs for the scanned documents are indicated in bold on the top

 of the document.

JURISDICTION AND VENUE

- 6. Jurisdiction of this court arises under 15 U.S.C. § 1681p.
- 7. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.
- Venue is proper, because many of the relevant events occurred within Oakland County in the State of Michigan.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | CASE NO. |
|--|--|------------------------------------|
| Court address 52-3 DISTRICT COURT 700 BARCLAY GIRCL | E ROCHESTER MI 48307 | Court telephone no: (248) 853-5553 |
| Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362 | CSC-Lawyer | |
| | Equifacilifo PO Box 1050 Atlanta, GA | |

PARTIES

- 9. Plaintiffs are Paul Tatseos and Eija Tatseos.
- 10. Plaintiffs are consumers as defined in 15-U.S.C. 5-1681 (a)(c).
- 11. Defendant is Equifax Information Services, LLC.
- 12. Defendant a "Consumer Reporting Agency" as defined in 15 U.S.C. § 1681 (a)(b) and 15 U.S.C. § 1681 (a)(f).

FACTS

Facts Common to All Counts

- 13. The Plaintiffs reside in Lake Orion, Oakland County, Michigan.
- 14. Plaintiffs' consumer reports are as defined by 15 U.S.C. § 1681 (a)(d), et seq.

Disputes of Inaccurate Information – Paul Tatseos

15. On September 24, 2013, Paul Tatseos sent a letter Certified Mail, Return Receipt

Requested (hereinafter "CMRRR") to Defendant disputing an item of information on his

consumer report for Accurate Account Solutions account 53647060279.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | CASE NO. 14 | 100 | |
|---|------------------------|---|---|---------|
| Court address 52-3 DISTRICT COURT 700 BARCLAY CIRC | CLE ROCHESTER ML 48307 | | Court telephone no: (248) 853-5553 | |
| Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362 | V | CSC-Lawyers inco | e(s) and address(es) orporating Service t for Equifax Information Services, LLC | 1 2 2 1 |
| | | Equifax Informat PO Box 105069 Atlanta, GA 3034 | ion Services, ILC | |

- 16. On October 23, 2013, Defendant reported Accurate Account Solutions account

 53647060279 on Paul Tatseos' consumer report as verified, but did not conduct a
 reasonable reinvestigation, rather relied on their "eOscar" computer system to
 perpetuate inaccurate information.
- 17. On November 12, 2013, Paul Taiseos sent a letter CMRRR to Defendant disputing items of information on his consumer report for Capital One account 4003447013470531, Charter One account 5240380004080623 and US Bank account 4190087706438354.
- 18. On December 2, 2013, Defendant reported Capital One account 4003447013470531,

 Charter One account 5240380004080623 and US Bank account 4190087706438354 on

 Paul Tatseos' consumer report as verified, but did not conduct a reasonable

 reinvestigation; rather relied on their "eOscar" computer system to perpetuate inaccurate information.
- 19. On December 17, 2013, Paul Tatseos sent a letter CMRRR to Defendant disputing items of information on his consumer report for Ally Financial account 045913929530, HSBC Bank account 5472048962 and Oakland County 52 District docket numbers 11C03090GC, 11C02769GC and 9C06199GC.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | | CASE NO. 14 |
|--|-----------------|----------|--|---|
| Court address 52-3 DISTRICT COURT 700 BARCLAY CIRC | LE ROCHESTER MI | 48307 | , | Court telephone no: . (248) 853-5553 |
| Plaintiff name(s) and address(es) Paul Tatseos & Elja Tatseos 905 Buckhorn Dr. Lake Orion MI 48362 | 8c 8 | V | Defendant name(s CSC-Lawyers Incom Registered Agent f 601 Abbott Road East Lansing, MI 4 | or Equifax Information Services, EEC |
| 4 | | : 3 | Equifax Information PO Box 105069 Atlanta, GA 30348 | n Services, LLC |

20. On January 15, 2013, Defendant reported Ally Financial account 045913929530, HSBC

Bank account 5472048962 and Oakland County 52 District docket number 11C02769GC on

Paul Tatseos' consumer report as verified, but did not conduct a reasonable

reinvestigation, rather relied on their "eOscar" computer system to perpetuate inaccurate information.

Disputes of Inaccurate Information - Eija Tatseos

- 21. On October 29, 2013, Eija Tatseos sent a letter CMRRR to Defendant disputing items of information on her consumer report for HSBC Bank account 601138002800xxxx, NCA account 601138002800xxxx and Senex Services account D3071782N1.
- 22. On November 23, 2013, Defendant reported *HSBC Bank account 601138002800xxx, NCA*account 601138002800xxx and Senex Services account D3071782N1 on Eija Tatseos'

 consumer report as verified, but did not conduct a reasonable reinvestigation, rather relied on their "eOscar" computer system to perpetuate inaccurate information.
- 23. On December 17, 2013, Eija Tatseos sent a letter CMRRR to Defendant disputing items of information on her consumer report for *Chase Bank USA NA account 5483109201359787*,

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | CASE NO. | | |
|---|------------|---------------|-------------------|----------------------------------|-------|
| Court address | | | | Court telephone no. | |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | CLE ROCHES | TER MI. 48307 | | (248) 853-5553 | |
| Plaintiff name(s) and address(es) | | v | Defendant name | (s) and address(es) | |
| Paul Tatseos & Eija Tatseos | | 3 | CSC-Lawyers inco | | |
| 905 Buckhorn Dr. | 196 | | Registered Agent | for Equifax Information Services | , LLC |
| Lake Orion MI 48362 | | | 601 Abbott Road | | |
| | | | East Lansing, MI | 48823: | |
| | | | Equifax Informati | on:Services;:世C | |
| P. | • | | PO Box 105069 | * | |
| | | | Atlanta, GA 3034 | Ballit a | |

HSBC Bank account 473068012801xxxx, and Oakland County 52 District docket numbers 09C06199GC and 13C00129GC.

24. On January 16, 2013, Defendant reported Chase Bank USA NA account

5483109201359787, HSBC Bank account 473068012801xxx, and Oakland County 52

District docket numbers 09C06199GC and 13C00129GC on Eija Tatseos' consumer report.

as verified, but did not conduct a reasonable reinvestigation, rather relied on their

"eOscar" computer system to perpetuate inaccurate information.

"Method of Verification" Requests

- 25. On December 17, 2013, Paul Tatseos sent a letter CMRRR to Defendant requesting

 "Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681

 (i)(a)(6)(B)(iii) for Accurate Account Solutions account 53647060279, Capital One account 4003447013470531, Charter One account 5240380004080623, and US Bank account 4190087706438354.
- 26. On December 17, 2013, Eija Tatseos sent a letter CMRRR to Defendant requesting "Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | CASE NO. 14 |
|---|------------------------|--|
| Court address | TE DOCUECTED AND ADDOC | Court telephone no. (248) 853-5553 |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362 | V | Defendant name(s) and address(es) CSC-Lawyers incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823: |
| | | Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348 |

- (i)(a)(6)(B)(iii) for HSBC Bank account 601138002800xxxx, NCA account 601138002800xxx and Senex Services account D3071782N1.
- 27. On February 4, 2014, Paul Tatseos sent a letter CMRRR to Defendant with a second request for "Method of Verification" for Accurate Account Solutions occount 53647060279, Capital One account 4003447013470531, Charter One account 5240380004080623, and US Bank account 4190087706438354; an initial "Method of Verification" request for Ally Financial account 045913929530, HSBC Bank account 5472048962 and Ookland County 52 District docket number 11C02769GC; and a notification of potential legal action for willful non-compliance of the Fair Credit Reporting Act, 15 U.S.C. § 1681.
- 28. On February 4, 2014, Eija Tatseos sent a letter CMRRR to Defendant requesting "Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681 (i)(a)(6)(B)(iii) for Chase Bank USA NA account 5483109201359787, HSBC Bank account 473068012801xxxx, and Oakland County 52 District docket numbers 09C06199GC and 13C00129GC.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAIN | CASE NO. |
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| Court address | | Court telephone no. |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | LE ROCHESTER MI 48307 | (248) 853-5553 |
| Plaintiff name(s) and address(es) | V | Defendant name(s) and address(es) |
| Paul Tatseos & Eija Tatseos | £2 | CSC-Lawyers incorporating Service |
| 905 Buckhorn Dr. | * | Registered Agent for Equifax Information Services, LLC |
| Lake Orion MI 48362 | | 601 Abbott Road |
| | 20 | East Lansing, MI 48823 |
| * · · · · · · · · · · · · · · · · · · · | | 12 20 |
| | · · · · · · · · · · · · · · · · · · · | Equifax Information Services, LLC |
| V. | 34 | PO Box 105069 |
| | | Atlanta, GA 30348 |

29. As of the date of this complaint, Defendant has not responded to any requests for either Plaintiff referenced in paragraphs 25-28 for "Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681 (i)(a)(6)(B)(iii).

COUNT I - VIOLATION OF 15 U.S.C. § 1681 (i)(a)(1)(A)

- 30. Plaintiffs restate and re-allege all above paragraphs herein.
- 31. On October 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting Accurate Account Solutions account 53647060279 on Paul Tatseos' consumer report as verified.
- -32. On December 2, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Capital One account 4003447013470531* on Paul Tatseos' consumer report as verified.
- 33. On December 2, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Charter One account 5240380004080623* on Paul Tatseos' consumer report as verified.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | т | CASE NO. |
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| Court address | £: | | | Court telephone no: |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | LE ROCHESTE | R MI 48307 | | (248) 853-5553 |
| Plaintiff name(s) and address(es) | 1 | V- | Defendant name(s |) and address(es) |
| Paul Tatseos & Eija Tatseos | 6 | | CSC-Lawyers Incor | porating Service |
| 905 Buckhorn Dr. | 1 | | Registered Agent | or Equifax Information Services, LLC |
| Lake Orion MI 48362 | 1 | | 601 Abbott Road | |
| | | | East Lansing, Mi-4 | 8823% |
| | | ** | Equifax Information | n Services, LLC |
| I . | | | PO Box 105069 | |
| | i | X | Atlanta, GA 30348 | |

- 34. On December 2, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting US Bank account 4190087706438354 on Paul Tatseos' consumer report as verified.
- 35. On January 15, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting Ally Financial account 045913929530 on Paul Tatseos' consumer report as verified.
- 36. On January 15, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting HSBC Bank account 5472048962 on Paul Tatseos' consumer report as verified.
- 37. On January 15, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting Oakland County 52 District docket number 11C02769GC on Paul Tatseos' consumer report as verified.
- 38. On November 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *HSBC Bank account 601138002800xxx* on Eija Tatseos' consumer report as verified.
- 39. On November 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting NCA account 601138002800xxxx on Eija Tatseos' consumer report as verified.

| JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | CASE NO. 14 |
|---|------------------------|---------------------|--------------------------------------|
| Court address | | | Court telephone no. |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | CLE ROCHESTER MI 48307 | 76 | (248) 853-5553 |
| Plaintiff name(s) and address(es) | ν. | Defendant name(s | and address(es) |
| Paul Tatseos & Elja Tatseos | i i | CSC-Lawyers Incom | porating Service |
| 905 Buckhorn Dr. | 47 g | Registered Agent fo | or Equifax Information Services, ELC |
| Lake Orion MI 48362 | k | 601 Abbott Road | 32 |
| | 72 | East Lansing, MI 44 | 8823 |
| 9° 9 | | 1 | |
| · · · · · · · · · · · · · · · · · · · | ľ | Equifax Information | n Services, LLC |
| 1 | 1 | PO Box 105069 | |
| | | Atlanta, GA 30348 | |

- 40. On November 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting Senex Services account D3071782N1 on Eija Tatseos' consumer report as verified.
- 41. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Chase Bank USA NA account 5483109201359787* on Eija Tatseos' consumer report as verified.
- 42. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *HSBC Bank account 473068012801xxxx* on Eija Tatseos' consumer report as verified.
- 43. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Oakland County 52 District docket number 09006199GC* on Eija Tatseos' consumer report as verified.
- 44. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Oakland County 52 District docket number 13C00129GC* on Eija Tatseos' consumer report as verified.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | CASE NO. 14 |
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| Court address: 52-3 DISTRICT COURT 700 BARCLAY CIRC | TE DOCUECTED NAL ADDOZ | 96 | Court-telephone-no: (248) 853-5553 |
| Comments of the Comments of th | | | CONTRACTOR OF THE CONTRACTOR O |
| Plaintiff name(s) and address(es) | V. | Defendant name(s) | |
| Paul Tatseos & Eija Tatseos | 1 | CSC-Lawyers Incorp | - |
| 905 Buckhorn Dr. | | Registered Agent for | r Equifax Information Services, LLC |
| Lake Orion MI 48362 | | 601 Abbott Road | 3 |
| Lanc Grisiviii 45552 | | East Lansing, Mi-48 | 823 |
| 9 5 | 1 | Equifax Information | : :Services;:EEC |
| 6.2 | | PO Box 105069 | |
| (t) | | Atlanta, GA 30348 | |

COUNT II - VIOLATION OF 15 U.S.C. §§ 1681 (i)(a)(7) and (i)(a)(6)(B)(iii)

- 45. Plaintiffs restate and re-allege all above paragraphs herein.
- 46. Defendant has not responded to Paul Tatseos. December 17, 2013 request for Method of Verification" for Accurate Account Solutions account 53647060279.
- 47. Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for Capital One account 4003447013470531.
- 48. Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for Charter One account 5240380004080623.
- 49: Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for US Bank account 4190087706438354.
- 50. Defendant has not responded to Eija Tatseos' December 17, 2013 request for "Method of Verification" for HSBC Bank account 601138002800xxxx
- 51. Defendant has not responded to Eija Tatseos' December 17, 2013 request for "Method of Verification" for NCA account 601138002800xxxxx
- 52. Defendant has not responded to Eija Tatseos' December 17, 2013 request for "Method of Verification" for Senex Services account D3071782N1.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | CASE NO. 14 |
|---|-----------------------|------------------|---|
| Court address | | * | Court telephone no. |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | LE ROCHESTER MI 48307 | | (248) 853-5553 |
| Plaintiff name(s) and address(es) | V | Defendant name | e(s)·and·address(es) |
| Paul Tatseos & Eija Tatseos | II. | CSC-Lawyers Inc | orporating Service |
| 905 Buckhorn Dr. | li i | Registered Agen | t for Equifax Information Services, LLC |
| Lake Orion MI 48362 | ~ | 601 Abbott Road | |
| ©. | | East Lansing, MI | 48823 |
| | · · | ě | 47 |
| | - 10 | Equifax Informat | tion Services; LLC |
| ¥ | 1 | PO Box 105069 | • |
| | | Atlanta, GA 3034 | 18 |

- 53. Defendant has not responded to Paul Tatseos' February 4, 2014 request for "Method of Verification" for Ally Financial account 045913929530.
- "54. Defendant has not responded to Paul Tatseos' February 4, 2014 request for "Method of Verification" for HSBC Bank account 5472048962.
- 55. Defendant has not responded to Paul Tatseos' February 4, 2014 request for "Methodrop Paul Tatseos" February 4, 2014 request for "Methodrop Paul Tatseos"
- 56. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for Chase Bank USA NA account 5483109201359787.
- 57. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of"

 Verification" for HSBC Bank account 473068012801200x.
- 58: Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for *Oakland County 52 District docket number 09C06199GC*.
- 59. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for *Oakland County 52 District docket number 13C00129GC*.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | | COMPLAINT | es Se Se | CASE NO. 14 |
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| Court address | | | W 12 | Court telephone no. |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | CLE ROCHES | TER MI. 48307 | Ø3 | (248) 853-5553 |
| Plaintiff name(s) and address(es) | 8 | 380 V | Defendant name(s) | and address(es) |
| Paul Tatseos & Eija Tatseos | | | CSC-Lawyers Incorpo | orating Service |
| 905 Buckhorn Dr. | | | Registered Agent for | Equifax Information Services, LLC |
| Lake Orion MI 48362 | % | 361 | 601 Abbott Road | |
| 8 | | 8 | East Lansing, MI 488 | 323 |
| 25: | | | | |
| | | | Equifax Information | Services, LLC |
| _ x | | | PO Box 105069 | |
| | | | Atlanta, GA 30348 | |

CLAIM FOR RELIEF

WHEREFORE, the Plaintiffs Paul Tatseos and Eija Tatseos, request that this Court enter judgment in its favor and against Defendant in the amount of:

- a) Statutory damages as provided by 15 U.S.C. §§ 1681 et seq. for each of the 14 violations of 15 U.S.C. § 1681 (i)(a)(1)(A) as described in Count I.
- b) Statutory damages as provided by 15 U.S.C. §§ 1681 et seq. for each of the 14 violations of 15 U.S.C. §§ 1681 (i)(a)(7) and (i)(a)(6)(B)(iii) as described in Count II.
- c) Punative damages as provided by 15 U.S.C. §§ 1681 et seq. as this Court may deem just and proper.
- d) Defendant's actual costs of this action, including but not limited to court filing fees to be determined at filing time, and US Postal Service fees in the amount of \$49.64.
- e) Injunctive relief as provided by 15 U.S.C. §§ 1681 et seq. by ordering removal of inaccurate information from Plaintiffs' consumer reports.
- f) Any and all other relief as the Court may deem just and proper.

| STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC | COMPLAINT | | CASE NO. 14 | |
|---|------------|--------------|------------------|---|
| Court address | | | | Court telephone no. |
| 52-3 DISTRICT COURT 700 BARCLAY CIRC | LE ROCHES | TER MI 48307 | | (248) 853-5553 |
| Plaintiff name(s) and address(es) | | v | 1 | e(s) and address(es) |
| Paul Tatseos & Elja Tatseos | | Ī | CSC-Lawyers inc | orporating Service |
| 905 Buckhorn Dr. | | | Registered Agen | t for Equifax Information Services, LLC |
| Lake Orion MI 48362 | | | 601 Abbott Road | d |
| Lake Grieffin 18552 | 3 1 | | East Lansing, MI | 48823 |
| 1 | | | Equifax informat | tion Services, LLC |
| | | | PO Box 105069 | |
| | | | Atlanta, GA 3034 | 18 |

Respectfully submitted

RECEIVED FOR FILING 52-3 DISTRICT COURT

Paul E Tatseos Eija K Tatseos 248-408-8484 905 Buckhorn Drive Lake Orion, MI 48362

April 7, 2014

Exhibit 1 – Plaintiffs' Letters

52-3 DISTRICT COURT

Paul Tatseos 905 Buckhorn Dr. Lake Orion, MI 48362 Re: Credit Report No. 334061130 Certified Mail #7012 3050 0000 0788 1695

September 24, 2013

Equifax Information Services, LLC PO Box 740256 Atlanta, GA 30374

Dear Sir or Madam:

I am writing to dispute the following trade lines on my credit report:

- JP Morgan Chase Bank, account number 412540014312, the entries marked "30 Days Late" for September 2009 and October 2009 are reported incorrectly. These payments were made on time. I am requesting the removal of these derogatory entries.
- HSBC Bank USA, N.A., account number 5472048962, the entries marked "30 Days Late" for January 2009 and February 2009 are reported incorrectly. These payments were made on time. I am requesting the removal of these derogatory entries.
- Accurate Account Solutions, account number 53647060279, I do not recognize this account, and do not believe it is mine. I am requesting the removal of this entire trade line.

Please investigate these trade lines and delete or correct (as above) the disputed items as soon as possible.

Regards,

Paul Tatseos

Paul Tatseos
905 Buckhorn Dr.
Lake Orion, MI 48362
Re: Credit Report No. 334061130
Certified Mail #7012 3050 0000 0788 0919

P17

November 12, 2013

Equifax Information Services, LLC PO Box 740256 Atlanta, GA 30374

Dear Sir or Madam:

I am writing to dispute the following trade lines on my credit report:

- EOS CCA, account numbers 3866888 & 6248707. I do not recognize these accounts, and do not believe they are mine.
- Capital One, account number 4003447013470531, the derogatory entries on this account are due to fraudulent activity and are not mine.
- Charter One, account number 5240380004080623, the derogatory entries on this account are due to fraudulent activity and are not mine.
- US Bank, account number 4190087706438354, the derogatory entries on this account are due to fraudulent
 activity and are not mine.

Equifax recently received and signed for documentation in which I substantiate and ask for a 7 year fraud alert (copy enclosed), which documents this disputes above related to fraudulent activity.

I am requesting the removal of the entire trade lines under dispute. Please investigate and delete the disputed Items as soon as possible.

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,

Paul Tatseos

Enclosures

Copy of letter requesting 7 year fraud alert received by Equifax September 3, 2013

Paul Tatseos 905 Buckhorn Dr. Lake Orion, MI 48362 Re: Credit Report No. 3323023946 Certified Mail #7012 3050 0000 0787 6967

P19 + P25

December 17, 2013

Equifax Information Services, LLC PO Box 740256 Atlanta, GA 30374

Dear Sir or Madam:

FIRST, I am writing to dispute the following trade lines/derogatory items on my credit report:

- Ally Financial, account number 045913929530; the derogatory entries on this account are due to fraudulent activity and are not mine.
- Discover Financial Services, account number 6011005390577503; the derogatory entries on this account are due to fraudulent activity and are not mine.
- HSBC Bank, account number 5472048962; the derogatory entries on this account are due to fraudulent activity and are not mine.
- Oakland County 52 District, docket numbers 11C03090GC, 11C02769GC and 9C06199GC; these public records are due to fraudulent activity and are not mine.

Equifax recently received documentation on September 3, 2013 in which I ask for a 7 year fraud alert and which includes an FTC ID Theft affidavit and police report. This documentation substantiates the above disputes. I am requesting the removal of these entire trade lines/public records, or removal of the derogatory entries as appropriate.

SECOND, I recently disputed trade lines from **Capital One** account # 4003447013470531, **Charter One** account #5240380004080623, **US Bank** account #4190087706438354 and **Accurate Account Solutions** account #53647060279. I have received your response of "Verified" for these accounts and find the lack of supporting detail to be unsatisfactory. Additionally, both Experian and TransUnion have investigated and deleted these fraudulent accounts from their records. Per FCRA 611 (a)(6)(B)(iii) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the accuracy and completeness of the information for these trade lines

Regards,

Paul Tatseos

P 21

Eija Tatseos 905 Buckhorn Dr. Lake Orion, Mi 48362 Re: Credit Report No. 3254028873 Certified Mail #7012 3050 0000 0788 0889

October 29, 2013

Equifax Information Services P.O. Box 105314 Atlanta, GA 30348

Dear Sir or Madam:

I am writing to dispute the following trade lines on my credit report:

HSBC Bank, partial account number 601138002800xxxx
NCA, partial account number 601138002800xxxx
Senex Services, account number D3071782N1
Congress Collection Corp, account numbers 1337401, 1340451 and 1403279

I do not recognize any of these accounts, and do not believe they are mine.

I am requesting the removal of these trade lines. Please investigate these trade lines and delete the disputed items as soon as possible.

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,

Eija Tatseos

S2-3 DISTRICT COURT

ZOIN APR -9 P 2:30

Elja Tatseos
905 Buckhorn Dr.
Lake Orion, MI 48362
Re: Credit Report No. 3309042005
Certified Mail #7012 3050 0000 0788 0957

P23 + P26

December 17, 2013

Equifax Information 5ervices P.O. Box 105314 Atlanta, GA 30348

Dear 5ir or Madam

FIRST, I am writing to dispute these trade lines on my credit report:

- Credit One Bank, account # 444796222179xxxx; I do not recognize this account; and do not believe it is mine.
- Chase Bank USA, NA, account # 5483109201359787; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **HSBC Bank**, account #473068012801xxxx; the derogatory entries on this account are due to fraudulent activity and are not mine.
- Discover Financial Services, account # 6011005390577503; the derogatory entries on this account are due to fraudulent activity and are not mine.
- Oakland County S2 District, docket numbers 09C06199GC, 10C008314GC & 13C00129GC; these public records are due to fraudulent activity and are not mine.

For the above accounts with fraudulent activity, I recently sent letters to the information furnishers, in which I Replain and substantiate the fraudulent activity on my account. I can provide copies of these letters, the FTC ID Theft affidavit and the police report upon request.

I am requesting the removal of these trade lines, or the elimination of derogatory entries as appropriate. Please investigate these trade lines and take corrective action as soon as possible.

SECOND, I recently disputed trade lines from HSBC Bank account # 601138002800xxxx, National Credit Adjusters account # 601138002800XXXX and Senex Services Corp account # D30717XXXX. I have received your response of "Verified" for these accounts and find the lack of supporting detail to be unsatisfactory. Per FCRA 611 (a)(6)(B)(iii) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the
 accuracy and completeness of the information for these trade lines

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,

Eija Tatseos

RECEIVED FOR FILING 52-3 DISTRICT COURT

Paul Tatseos
905 Buckhorn Dr.
Lake Orion, MI 48362
Re: Credit Report No. 3323023946
Certified Mail #7012 3050 0000 0787 7070

P27

February 4, 2014

Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348

Dear Sir or Madam:

On December 17, 2013, I sent a letter to you in which I request a "Method of Verification" per my rights under FCRA 611(a)(6) & (7) for several prior disputes. Somehow you appeared to misunderstand this request, and instead resolved my request for each trade line by stating "We verified that this item belongs to you."

At this time I am well within my rights to take legal action for willful non-compliance under FCRA 616. I prefer for this to be resolved outside of the legal system however, so I will once again ask you to provide a FCRA 611(a)(6) & (7) Method of Verification for the following previously disputed entries:

- Capital One account # 4003447013470531
- Charter One account #5240380004080623
- US Bank account #4190087706438354
- Accurate Account Solutions account #53647060279

...and also for the following trade lines for which you just very recently also "verified":

- Ally Financial, account number 045913929530
- HSBC Bank, account number 5472048962
- Oakland County 52 District, docket numbers 11C02769GC and 9C06199GC

Per FCRA 611(a)(6) & (7) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the accuracy and completeness of the information for these trade lines

Please also provide copies of any additional documentation that might have been provided by the original source.

Regards,

Paul Tatseos

Eija Tatseos 905 Buckhorn Dr. Lake Orion, MI 48362 Re: Credit Report No. 3309042005 Certified Mail #7012 3050 0000 0787 7131

P28

February 4, 2014

Equifax Information Services P. O. Box 105069 Atlanta, GA 30348

Dear Sir or Madam:

I recently disputed the following trade lines and entries on my credit report:

- Chase Bank USA account # 5483109201359787
- HSBC Bank Nevada account # 473068012801xxxx
- 52-3 District Court Public Records docket numbers 13C00129GC and 09C06199GC

I have received your response of "Verified" for these accounts and find the lack of supporting detail to be unsatisfactory. Per FCRA 611(a)(6) & (7) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the
 accuracy and completeness of the information for these trade lines

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above

Regards,

SUSTRICT COURT

Eija Tatseos

Exhibit 2 – Proofs of receipt

52-3 DISTRICT COURT

| P15 APLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY |
|--|--|
| | A. Signature Agent Address |
| so that we can return the card to you. Attach this card to the back of the mailplece, or on the front if space permits. | B. Received by (Printed Name) C. Date of Deliv |
| 1. Article Addressed to: EQUIFAX PO BOX 740256 | D. Is delivery address different from item 1? ☐ Yes if YES, enter delivery address below: ☐ No |
| ATLANTA, GA 30374 | 3. Service Type ACertified Mail Express Mail Registered Return Receipt for Merchand Insured Mail C.O.D. |
| | 4. Restricted Delivery? (Extra Fee) |
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| PS Form 3811. February 2004 Domestic Re PS Form 3811. February 2004 Domestic Re PLETE THIS SECTION Lete Items 1, 2, and 3. Also complete In 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailplece. | COMPLETE THIS SECTION ON DELIVERY A. Signature A. Agent Address B. Received by (Printed Name) C. Date of Delivery |
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| plete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: CQUIFAX PO 30X 740256 | A. Signature X. Agent Addressee B. Received by (Printed Name) D. Is defivery address different from item 1? If YES, enter delivery address below: No |
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| Detris Section ate items 1, 2, and 3. Also complete and 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, for on the front if space permits. Article Addressed to: COVIERX PODOX 105314 | COMPLETE THIS SECTION ON DELIVERY A Signature A Agent Addressee B. Received by (Printed Name) C. Date of Delivery D. is delivery, address different from item 1? Yes If YES, enter delivery address below: |
| ete items 1, 2, and 3. Also completeem 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mallplece, lor on the front if space permits. Article Addressed to: CONFAX PODOX 105314 ATLANTA, GA 30348 | COMPLETE THIS SECTION ON DELIVERY A. Signature X. Agent Addressee B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from Item 1? Yes If YES, enter delivery address below: |
| P21 JETHIS SECTION Let elterns 1, 2, and 3. Also complete them 4 if Restricted Delivery is desired. Print your name and address on the reverse is so that we can return the card to you. Attach this card to the back of the mailplece, for on the front if space permits. Article Addressed to: COULFAX PODOX 105319 ATLANTA GA 30348 Article Number | COMPLETE THIS SECTION ON DELIVERY A. Signature X. Agent Addressee B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No 3. Service Type Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D. |

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| ste Items 1, 2, and 3. Also complete and 4 if Restricted Delivery is desired. | A. Signature X B. Received by (Printed Name) | ☐ Agent ☐ Addressee C. Date of Delivery |
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| July Items 1, 2, and 3. Also complete July 1, 1, 2, and 3. Also complete July 1, 3, 4, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, | A. Signature X B. Received by (Printed Name) D. Is delivery address different from it YES, enter delivery address be 3. Service Type Coertified Mail Express N | Agent Addressee C. Date of Delivery 2/12/14 tem 1? Yes |
| Je items 1, 2, and 3. Also complete In 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: COULFAX PO BOX 105069 | A. Signature X B. Received by (Printed Name) D. Is delivery address different from it YES, enter delivery address be 3. Service Type Acceptified Mail Express Not the Registered Return Reference Return Referenc | Agent Addressee C. Date of Delivery CIIZIT Tem 1? Yes Iow: No |

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| ATLANTA CA 30348 | 3. Service Type |
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| | 4. Restricted Delivery? (Extra Fee) |
| 2. Article Number: 7012 3050 | 0000 0787 7131 |

52-3 DISTRICT COURT